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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
MISSOULA DIVISION**

SAMANTHA ALARIO, *et al.*,

*Plaintiffs,*

and

TIKTOK INC.,

*Consolidated Plaintiff,*

v.

AUSTIN KNUDSEN, *in his official capacity as Attorney General of the State of Montana,*

*Defendant.*

Lead Case No.  
CV 23-56-M-DWM

Member Case No.  
CV 23-61-M-DWM

**DECLARATION OF VERA EIDELMAN IN SUPPORT OF MOTION FOR PRO HAC VICE ADMISSION**

I, Vera Eidelman, state as follows:

1. I, by and through Montana counsel and pursuant to Rule 83.1(d) of the Local Rules of Procedure of the United States District Court for the District of Montana, respectfully apply to the Court to appear in this case *pro hac vice* on behalf of Amici Curiae American Civil Liberties Union, American Civil Liberties Union of Montana, and Electronic Frontier Foundation.

2. I do not reside in Montana, nor am I regularly employed in Montana. I reside in the State of New York and have my office at 125 Broad Street, 18th Floor, (212) 549-2556, email: veidelman@aclu.org.

3. My firm will pay, simultaneously with filing this application, the admission fee shown on the Court's website.

4. I am proficient in electronic filing in another federal district court.

5. I have been admitted to practice before the following courts:

Court	Date of Admission	Status
Northern District of California (No. 308535)	Dec. 6, 2017	Active
Southern District of New York (No. 5646088)	Jan. 25, 2022	Active
Second Circuit	Nov. 20, 2020	Active

Fifth Circuit	Nov. 2, 2019	Active
Eighth Circuit (No. 19-0114)	Mar. 5, 2019	Active
Ninth Circuit	Oct. 4, 2018	Active
Tenth Circuit	Sept. 15, 2021	Active
Eleventh Circuit	Oct. 12, 2018	Active
Supreme Court of the United States	May 1, 2023	Active

6. I am in good standing and eligible to practice in each of the courts listed above and am not currently suspended or disbarred in any other court.

7. I have never been held in contempt, otherwise disciplined by any court for disobedience to its rules or orders, or sanctioned under Federal Rules of Civil Procedure 11 or 37(b), (c), (d), or (f) or their state equivalent.

8. I am not currently making, nor have I made within the two years preceding this application, any *pro hac vice* applications to this Court.

9. I understand that *pro hac vice* admission in this Court is personal to me only and not an admission of a law firm and that I will be held fully accountable for the conduct of the litigation in this Court.

10. In accordance with Montana Rule of Professional Conduct 8.5, I swear and affirm that I will be bound by the Montana Rules of Professional Conduct (except Rules 6.1 through 6.4) in my practice of law in this State.

11. Furthermore, pursuant to Montana Rule of Professional Conduct 8.5, I understand and certify that I will be subject to the disciplinary authority of this State. A copy of this certification will be mailed contemporaneously to the State Bar of Montana in Helena. Furthermore, pursuant to Local Rule 83.2(a), I understand that the standards of professional conduct of attorneys appearing in this Court include the American Bar Association's Model Rules of Professional Conduct and the Montana Rules of Professional Conduct.

12. I swear and affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true to my knowledge.

Dated: August 8, 2023

/s/ Vera Eidelman

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*Counsel for Amici Curiae American Civil Liberties Union, American Civil Liberties Union of Montana, and Electronic Frontier Foundation*